

# Draft Program Year 2022 Ohio Recovery Housing Program Action Plan Amendment

August 2022

Prepared By:
Ohio Department of Development
Community Services Division
Office of Community Development

Mike DeWine, Governor of Ohio
Jon Husted, Lt. Governor of Ohio
Lydia Mihalik, Director
Ohio Department of Development

## **Program Year 2022 Ohio Recovery Housing Program Action Plan Amendment**

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#### **Definitions:**

Individual in Recovery<sup>1</sup>: A process of change through which individuals improve their health and wellness, live a self-directed life, and strive to reach their full potential.

Substance Use Disorder<sup>2</sup>: The recurrent use of alcohol and/or drugs causes clinically significant impairment, including health problems, disability, and failure to meet major responsibilities at work, school, or home.

Recovery Housing<sup>3</sup>: Per Ohio Revised Code Section 340.01 Housing for individuals recovering from alcoholism or drug addiction that provides an alcohol and drug-free living environment, peer support, assistance with obtaining alcohol and drug addiction services, and other alcoholism and drug addiction recovery assistance.

# Program Year (PY) 2022 Ohio Recovery Housing Program (RHP) Action Plan Amendment Summary

As outlined in HUD Notice No. FR–6265–N–01 issued on July 21, 2021, grantees will have a single, combined RHP Action Plan for the use of RHP funds, including any and all allocations from existing and future appropriations authorized under the SUPPORT Act. For future allocations, grantees must submit a RHP Action Plan or amendment, including a Form SF–424, application for federal funds, for the allocated funds by August 16 of the fiscal year following the fiscal year in which the funds were authorized. As a result of HUD allocating \$1,147,832 in PY 2022 Recovery Housing Program funds to the state of Ohio, the state is required to undergo a public participation process to amend the approved Recovery Housing Pilot Action Plan with the RHP Action Plan amendment, as well as any required submissions, due by August 16, 2023. The citizen participation process is outlined under the Citizen Participation Summary section of the plan.

#### **Program Summary:**

The Ohio Department of Development (Development) in partnership with the Ohio Department of Mental Health and Addiction Services (OhioMHAS) propose Ohio's Recovery Housing Program (RHP) in response to the U.S. Department of Housing and Urban Development (HUD) Federal Register No. FR-6225-N-01.

According to the <sup>4</sup>CDC in 2019, Ohio had the fourth highest number of overdose deaths in the nation. Under the DeWine Administration, the RecoveryOhio Advisory Council has prioritized supportive housing as an essential recovery resource in our communities and an evidence-based approach that supports multiple pathways, centered on individual choice. Recovery homes are often run by behavioral health providers, peers with lived substance use experience, churches, or other local nonprofits.

The Recovery Housing in Ohio 2021 Environmental Scan, completed in partnership with Ohio's National Alliance for Recovery Residences (NARR) Affiliate, Ohio Recovery Housing, and OhioMHAS, made recommendations for Ohio to continue to address service gaps and barriers to recovery housing. Recommendations from the scan include steps to ensure access for underserved and rural Ohioans by increasing the number of homes adhering to NARR standards, providing additional clarity to operators and residents regarding quality standards and requirements, and advancing racial equity among recovery support services.

https://www.cdc.gov/nchs/pressroom/sosmap/drug\_poisoning\_mortality/drug\_poisoning.htm

<sup>&</sup>lt;sup>1</sup> Definition from the Substance and Mental Health Services Administration: https://store.samhsa.gov/sites/default/files/d7/priv/pep12-recdef.pdf

<sup>&</sup>lt;sup>2</sup> Definition from the Substance and Mental Health Services Administration: <a href="https://www.samhsa.gov/find-help/disorders">https://www.samhsa.gov/find-help/disorders</a>

<sup>&</sup>lt;sup>3</sup> Definition from Ohio Revised Code Section 340.01 https://codes.ohio.gov/ohio-revised-code/section-340.01

<sup>&</sup>lt;sup>4</sup> CDC Overdose Rates Nationwide 2019

Of the 582 known recovery residences in Ohio (Levels I-III), 268 are currently certified by Ohio's Recovery Housing Program (ORH) as meeting NARR standards. These certifications and other quality standards help encourage use of best practice guidelines and conveys quality and confidence to prospective residents and referral sources. ORH reports that many operators in the process of obtaining the voluntary certification meet barriers in funding quality improvements identified as a deficiency during the inspection of the property. ORH reports that about one third of the currently certified recovery operators have additional properties they would be interested in certifying if funds were available. They have not applied for certification at this time because they know the other homes would not meet the quality standards.

OhioMHAS has identified the need to provide funding for the construction, reconstruction and rehabilitation of recovery housing projects that meet level I, II or III NARR standards. Priority for new construction projects will be given to projects serving specialty populations and projects located in rural counties with zero recovery homes. Specialty populations could include but are not limited to LGBTQI+, Latino, African American, Veteran or family-specific recovery housing.

#### **Administration Summary:**

The RHP will be administered by the Development and OhioMHAS. The roles and responsibilities of each agency will be as follows:

#### **Development Roles**

Development is required to submit the Recovery Housing Program Action Plan for the state of Ohio in HUD's Disaster Recovery Grant Reporting System. Development has awarded the PY 2020 and PY 2021 RHP allocations and will award the PY 2022 RHP allocation to the OhioMHAS' Office of Recovery Supports and Housing to carry out the program in accordance with applicable HUD regulations and grant requirements relating to monitoring and management. Once HUD accepts the RHP Action Plan, HUD and Development will enter into a grant agreement. Once HUD transmits the RHP grant agreement to Development, Development will sign and return the grant agreement for HUD's signature

#### **Development Contacts:**

Shana Garrett
Office of Community Development
Riffe Center, 26th Floor
77 South High Street
Columbus, Ohio 43215
Phone: (614) 466-2285

shana.garrett@development.ohio.gov

Ian Thomas
Office of Community Development
Riffe Center, 26th Floor
77 South High Street
Columbus, Ohio 43215
Phone: (614) 466-2285
ian.thomas@development.ohio.gov

#### OhioMHAS Roles

- Identify eligible activities for the rehabilitation of recovery housing facilities;
- Set parameters for fund distribution and distribute the funds;
- Execute Grant Agreements with drug and alcohol recovery house providers and Ohio's NARR affiliate ORH:
- Provide day-to-day oversight and monitoring of subrecipients in performance under the RHP and with pertinent grant agreement requirements;
- Report to Development expenditure and performance data as requested by Development; and
- Collect data and information on eligibility and national objective compliance.

#### OhioMHAS Contacts:

Roma Barickman
Manager of the Housing & Homelessness Program and Policy Team
30 East Broad St. 36th Floor
Columbus, Ohio 43215
Roma.barickman@mha.ohio.gov

Kaitlin Waggoner Recovery Housing Administrator 30 East Broad St. 36th Floor Columbus, Ohio 43215

Kaitlin.waggoner@mha.ohio.gov

Phone: (614) 208-9777

Phone: (614)466-4750

#### **Use of Funds:**

There will be no change in the use of RHP funds as part of the substantial amendment to the approved PY 2020 and PY 2021 RHP Action Plan. The funding for the RHP will be partially distributed on a first-come, first-served basis to eligible applicants seeking repairs or renovations to meet NARR quality standards through ORH. Funds for this purpose will be granted to ORH who will identify eligible operators seeking their initial quality certification through their existing application process.

New construction projects will not be competitively bid, rather, the funds will be based on the Alcohol Drug and Mental Health Services (ADAMHS) Boards community plans<sup>5</sup> for construction projects that meet Ohio's definition of Recovery Housing. Ohio's 50 local ADAMHS boards, that represent all 88 counties, are required by law to complete a community plan which identifies funding needs and gaps in services. OhioMHAS's Capital Planning office assists in the development of housing, program, and consumer-operated services projects in the community. RHP funds for construction will be granted directly to the prospective recovery housing projects following MHAS's capital process.

To comply with recommendations from the Model Recovery Residence Certification Act capital process, applicants will agree to become certified by Ohio's NARR affiliate, Ohio Recovery Housing, within six months of operating. Additionally, all recovery residences shall ensure that residents who are legitimately prescribed or dispensed medications, including medications for the treatment of substance use disorder (MAT), from an individual or a treatment program legally authorized to prescribe or dispense such medications, have access to such medication and are not denied tenancy in a recovery residence or made to discontinue the use of the medication for continued residency. If a recovery residence is unable to support MAT in a manner that is safe for all residents, they must provide a policy for referring individuals receiving MAT to a recovery residence which can better support their needs.

OhioMHAS will be making grants directly to new construction projects through the capital planning office. New construction project grantees will be required to follow all aspects of OhioMHAS's capital process which requires competitive bids for all contractors.

OhioMHAS will be making a grant directly to ORH to support Recovery Housing operators in addressing barriers to receiving their quality certification due to physical property deficiencies. Funds to recovery housing operators for renovation or reconstruction through ORH will be limited to \$10,000 per recovery home.

Training and technical assistance will be provided by OHMAS and ORH.

<sup>&</sup>lt;sup>5</sup> Ohio MHAS Community Plan Guidelines FY 21-22 <a href="https://mha.ohio.gov/wps/wcm/connect/gov/95787a7c-22b5-4714-9ded-defb3a2e5222/Final+Community+Plan+Guidelines+for+2021-2022+.pdf?MOD=AJPERES&CVID=nMjhYZ">https://mha.ohio.gov/wps/wcm/connect/gov/95787a7c-22b5-4714-9ded-defb3a2e5222/Final+Community+Plan+Guidelines+for+2021-2022+.pdf?MOD=AJPERES&CVID=nMjhYZ</a>.

#### **Eligible Subrecipients:**

Eligible subrecipients include Ohio's NARR affiliate and housing projects that meet Ohio's definition of Recovery Housing. All subrecipients will have to sign Ohio MHAS's agreements and assurances to receive funds.

New construction projects will be required to follow the MHAS Capital Community Project Guidelines. The capital guidelines include questions about how consumers, family members and providers participate in the planning of this project and requires a description of how the project will fill a gap in the local continuum of care.

Subgrantees receiving funds through ORH's reconstruction or renovation grant must be a Recovery Housing Operator in the process of obtaining their organization's initial voluntary quality certification to be eligible for funding. There are currently 11 steps to the quality certification application process. Eligible operators will have completed all of the steps 1-8 of the application process to be certified through ORH including review of policies and procedures, a phone interview, paying the fees for certification, receiving an onsite review of the dwelling and in person interview<sup>6</sup>.

#### Criteria for evaluation of applications and applicants:

A portion of the RHP funds will be used to provide the 50% match required to use existing Capital Funds. MHAS will work with the project and the local ADAMHS board to ensure funds at the local level can be leveraged for operating costs. All projects must follow MHAS' Capital Funding application process<sup>7</sup> and guidelines for funding<sup>8</sup> if their application is approved.

ORH will be sub granting small amounts of funding, no more than \$10,000 per home, to existing Recovery Housing Operators for critical repairs and reconstruction required to meet quality housing standards required for certification. These recovery housing operators must meet all other certification requirements in steps 1 through 8 of the application processes prior to becoming eligible for these funds. Eligible operators will only be able to spend funding on deficiencies identified by ORH during the onsite review of the property as a required quality improvement to proceed with certification. If an operator is unable to afford the quality improvements required to obtain the quality certification ORH will be able to offer these funds on a first come first serve basis, so the operators are able to continue the application process. Eligible operators will be required to sign ORH's attestation, OhioMHAS's attestations, agree to all rules and regulations of the grant funds as well as agreeing to collect data on the residents residing in the recovery home prior to receiving funds.

#### **Pre-award/Pre-Agreement Costs:**

Development and OhioMHAS have decided that pre-award or pre-agreement costs will not be eligible for reimbursement with RHP funds

#### **Anticipated Outcomes and Expenditure Plan:**

Development, in partnership with OhioMHAS, will comply with all RHP guidelines and expend at least 30% of the funds within one year from the date when funds are made available. We anticipate meeting the requirement that all funds be fully expended by September 1, 2027. Administrative costs will not exceed the 5% cap.

<sup>&</sup>lt;sup>6</sup> Ohio Recovery Housing's Steps to Apply for Quality Certification https://www.ohiorecoveryhousing.org/applying-for-certification

<sup>&</sup>lt;sup>7</sup> Ohio MHAS Community Capital Assistance Project Application FY19-24 <a href="https://mha.ohio.gov/static/Portals/0/assets/SchoolsAndCommunities/CommunityAndHousing/CapitalPlanning/Community-Capital-Plan-FY19-24-Memo-and-Worksheets.pdf">https://mha.ohio.gov/static/Portals/0/assets/SchoolsAndCommunity-Capital-Plan-FY19-24-Memo-and-Worksheets.pdf</a>?ver=2018-12-14-110627-587

<sup>&</sup>lt;sup>8</sup> Ohio MHAS Community Capital Assistance Projects Process Guidelines https://mha.ohio.gov/static/Portals/0/assets/SchoolsAndCommunities/CommunityAndHousing/Community-Planning/2019/CAPITAL.GUIDELINES rev April2019.pdf?ver=2019-08-09-132425-143

Grantees will be required to complete ORH's outcomes tool for all residents living in the recovery home. The outcomes survey is a resident-driven survey completed at move-in, 6 months and discharge. Along with completing the outcomes tool grantees will be required to report the total number of individuals assisted in RHP activities and the number individuals able to transition to permanent housing through RHP-assisted temporary housing annually. It is anticipated that 25 recovery homes will receive their initial quality certification within the first year of funding and 25 additional homes will receive their quality certification within the second year of funding. MHAS anticipates funding multiple construction projects within the first grant year.

#### **Citizen Participation Summary:**

In accordance with 24 CFR 91.105(a)(3) and 91.115(a)(3) concurrently to address RHP funds, and to allow no less than 15 calendar days of public comment, the state of Ohio's Consolidated Plan citizen participation plan has been amended. The Recovery Housing Program Action Plan citizen participation plan amendment has been included as part of the Recovery Housing Program Action Plan Public Comment Period Memo located at

https://development.ohio.gov/wps/portal/gov/development/community-resources/ohio-consolidated-plan.

Development held a public hearing on the Recovery Housing Program Action Plan on December 1, 2021, at 10:30 a.m. in the Riffe Center in Room 1932 and via Webex. Interested parties were able to submit oral or written testimony at anytime during the public comment period that took place from November 23, 2021 to December 10, 2021.

As part of the RHP Action Plan Amendment as a result of the allocation of PY 2022 RHP funds. Development will allow interested parties to submit written testimony via email to <a href="mailto:lan.Thomas@development.ohio.gov">lan.Thomas@development.ohio.gov</a> any time during the 15-day public comment period beginning September 1, 2022. Interested parties must submit written comments no later than 11:59 p.m. on September 16, 2022. Questions regarding the plan or comment process should be emailed to lan Thomas@development.ohio.gov.

Development will hold a public hearing on the PY 2022 Recovery Housing Program Action Plan substantial amendment on September 7, 2022, at 10:15 a.m. in Columbus, at the location listed below. Interested parties can submit oral or written testimony at that time. Questions regarding the plans or comment process should be emailed to Ian Thomas at <a href="mailto:lan.Thomas@development.ohio.gov">lan.Thomas@development.ohio.gov</a>.

September 7, 2022 10:15 a.m. Riffe Center Room 1932 77 South High Street Columbus, Ohio 43215

The comments and responses made on the draft Ohio Recovery Housing Program Action Plan Amendment will be included in the Public Comments and Responses section of this plan.

#### **Partner Coordination:**

Governor Mike DeWine commissioned the RecoveryOhio initiative in January 2019 to coordinate the work of state departments, boards, and commissions by leveraging Ohio's existing resources and seeking new opportunities<sup>9</sup>. While engaging local governments, coalitions, and task forces, RecoveryOhio's goals are to create a system to help make treatment available to Ohioans in need, provide support services for

<sup>9</sup> Recovery Ohio information from https://recoveryohio.gov/wps/portal/gov/recovery/about/overview

those in recovery and their families, offer direction for the state's prevention and education efforts, and work with local law enforcement to provide resources to fight illicit drugs at the source.

The RecoveryOhio Housing subcommittee includes members from the Departments of Health, OhioMHAS, Development, Medicaid, Job and Family Services and Rehabilitation and Corrections, Ohio Housing Finance Agency, Opportunity for Ohioans with Disabilities, and the Social Work and Counselor Board. The subcommittee is tasked with reviewing and creating a comprehensive statewide plan for safe, affordable, and quality housing that will meet the needs of individuals with mental health and substance use disorders so they can fully participate in community and family life. The plan will include supported housing options, transitional housing, recovery housing, adult care facilities, and short-term stabilization options to provide housing stability and choice. The plan will recognize that housing for people with mental health and substance use disorders will allow for and coordinate with treatment providers to ensure alignment of individuals' treatment plans, including medications. This plan must consider the housing barriers faced by people who have criminal records and evaluate options for individuals who may not be able to live independently to provide the highest quality of life possible.

In 2019, the local ADAMHS Boards completed a housing needs assessment. The results are in the tables below.

Wait List Data as Reported on Housing Needs Assessment, Statewide, SFY 2017

Housing Category	Ave. Min Wait Time	Ave. Max Wait Time	Ave. Number of People on waitlist
Recovery Housing Level 1	125.3	168	167.5
Recovery Housing Level 2	23.9	35.8	11
Recovery Housing Level 3	49	63.6	35.8

#### Housing Resources Needed: Clients with Substance Use Diagnosis Only\* Statewide

Housing Category	Single Adults	Criminal Justice	Families	Opiate Use	Pregnant Women	Transition Age Youth
Recovery Housing Level 1	200	10	0	8	1	5
Recovery Housing Level 2	363	0	12	25	31	15
Recovery Housing Level 3	10	0	0	0	0	10

<sup>\*</sup> May represent either units or beds needed depending on category

RHP new construction grantees will be required to work with their local Alcohol Drug and Mental Health boards to coordinate funds their communities are receiving through SOR, Recovery Housing Initiative, and SABG dollars.

The current Capital funding requests from the local ADAMHS Boards for recovery housing projects are as follows:

Fiscal Biennium	Number of Projects	Amount
FY 21-22	16	\$2,935,517.14
FY 23-24	15	\$4,747,270.00
Total		\$7,682,787.14

Some local ADAMHS boards are unable to partner with Recovery Housing operators who do not have their quality certification through ORH due to their legal interpretation of Ohio's code. Recovery Homes that can receive RHP funding through ORH and obtain their quality certification will have increased opportunities for partnerships in their local community.

#### Resources

The total amount of Ohio's RHP funds for FY20 is \$1,225,000, FY21 is \$1,060,722 and FY22 is \$1,147,832. This brings the total combined funding available for Ohio's RHP plan amendment for the

construction, reconstruction and rehabilitation of recovery housing projects that meet level I, II or III NARR standards to \$3,433,554.

Additional federal and state resources available to RHP grantees include SOR funding, Recovery Housing Initiative funds from Ohio's general revenue fund, tax credits through Ohio Finance Agency (OHFA) and Housing Development Gap Financing with Ohio Housing Trust Fund Dollars. ADAMHS Board local levy funds may be available at the local level depending on the county the RHP project is located. Private Resources available to grantees include income generated from resident rent.

#### **Subrecipient Management and Monitoring:**

All grantees will be subject to following Ohio MHAS's agreements and assurances<sup>10</sup>. SUB-AWARDEES subject to the audit requirements of 45 CFR Pt 75, Subpart F are required to submit to the DEPARTMENT a copy of their audit(s) covering the period of the sub-award. If SUB-AWARDEE is not subject to the audit requirements of 45 CFR Pt 75, Subpart F, SUB-AWARDEE shall submit to the DEPARTMENT a copy of its annual financial audit(s) or review(s) covering the period of the sub-award within the earlier of thirty (30) days after receipt of the auditor's report(s) or nine months after the end of the audit period, or such longer period as is agreed to in advance by the DEPARTMENT, unless a waiver of this requirement is approved in advance by the DEPARTMENT. [45 CFR Part 75, Subpart F; ORC 9.234]

Projects receiving Capital Funding will be closely monitored through OhioMHAS's Capital Office and be subject to following all guidelines of the Capital process. Operators receiving funding from ORH to assist in correcting deficiencies needed to obtain their quality certification will also be required to sign ORH's assurances<sup>11</sup>.

#### Standard Form 424 and 424D

The 424 Forms for PY 2020 and PY 2021 have been signed by the Director of the Ohio Department of Development and have been included as part of the initial submittal to HUD. The PY 2022 424 Forms will be included as part of the RHP Action Plan Amendment submittal to HUD. In addition to the 424 Forms the RHP State Certifications have been included as part of the final submittal.

#### **Public Comments and Responses**

As indicated in the amended citizen participation plan memo, the public comment period as part of the initial RHP Action Plan took place from November 23, 2021 - December 10, 2021, with the public hearing held on December 1, 2021. The PY 2022 RHP Action Plan Amendment Public Comments and Responses will be included as part of the final submittal to HUD. The memo announcing the public participation opportunities, as well as the amended citizen participation plan was located at <a href="https://development.ohio.gov/wps/portal/gov/development/community/community-resources/ohio-consolidated-plan">https://development.ohio.gov/wps/portal/gov/development/community/community-resources/ohio-consolidated-plan</a>.

<sup>10</sup> Ohio MHAS Agreements and Assurances for Grantees FY 22 <a href="https://mha.ohio.gov/wps/wcm/connect/gov/7cb191fc-74c2-41f0-b4c4-ca3f36fb6596/FY2022-Agreements-and-Assurances.pdf?MOD=AJPERES&CONVERT\_TO=url&CACHEID=ROOTWORKSPACE.Z18\_M1HGGIK0N0JO00QO9DDDDM300\_0-7cb191fc-74c2-41f0-b4c4-ca3f36fb6596-nOz5DJB</p>

<sup>&</sup>lt;sup>11</sup>Ohio Recovery Housing's Assurances <a href="https://63f78b26-80cc-40a7-b987-4819ba5e1208.filesusr.com/ugd/3c8c7e\_3762097efb4b4eada190dc9985e0e6ba.pdf">https://63f78b26-80cc-40a7-b987-4819ba5e1208.filesusr.com/ugd/3c8c7e\_3762097efb4b4eada190dc9985e0e6ba.pdf</a>

#### **Attendance**

Name Attendee Email

Deauna Gibbs deauna.gibbs@development.ohio.gov
Danielle Gray danielle@ohiorecoveryhousing.org
Kaitlin Waggoner kaitlin.waggoner@mha.ohio.gov
Katie Breidenbach Wooding katie@ohiorecoveryhousing.org
Sally Luken sally.luken@lukensolutions.com

Michaella Radich, OACBHA mradich@oacbha.org
Chris Hayes chayes@oacbha.org

Shana Garrett shana.garrett@development.ohio.gov
Dirk Lackovich-Van Gorp dlackovich-vangorp@clarkcountyohio.gov

The following comments were received during the public comment period or at the public hearing:

#### Comment #1



35 E. Gay Street, Suite 401 | Columbus, OH 43215 614-453-5133 (office) | 614-228-0740 (fax) www.OhioRecoveryHousing.org

November 30, 2021

lan Thomas
Office of Community Development
Riffe Center, 26<sup>th</sup> Floor
77 South High St
Columbus, OH 43215
Via Email: <u>lan.Thomas@development.ohio.gov</u>

Dear Ian Thomas:

Thank you for the opportunity to provide comment on Ohio's Recovery Housing Program Action Plan. My name is Danielle Gray and I serve as Executive Director of Ohio Recovery Housing. It is our mission to increase access to quality recovery housing for Ohioans with substance use disorders. Quality recovery housing provides not only a safe, healthy, and affordable housing environment, but ensures that residents of the recovery home have peer support and connection to needed treatment and recovery support services in the community.

We know that recovery housing works. Ohio Recovery Housing has been collecting data on resident outcomes using a resident survey since 2016. A recent analysis of the survey results demonstrates the impact of recovery housing. 91% of residents who move out of recovery housing were moving out to their own home, rejoin their family, move in with a friend or other stable and independent living environment. 98% of residents indicate that they are connected to an ongoing recovery support that is likely to continue after they have left recovery housing. Only 21% of residents were employed when they moved into recovery housing, compared to 52% of residents at move out. A little less than half (48%) of residents had no income when they moved into recovery housing compared to only 33% of move-out respondents. These results indicate that residents of recovery housing not only provides support for recovery, but also helps residents gain employment, increase income, and build lasting recovery capital for their future.

Now more than ever, it is critical to ensure access to high quality recovery housing options for Ohioans with substance use disorders. As Ohio faces a growing addiction epidemic, this recovery support is going to be even more critical. We know that the COVID-19 pandemic has exacerbated the addiction crisis, causing an increase in statewide overdoses and overdose deaths. In addition to opiate related overdoses and overdose deaths, we are seeing a concerning rise in misuse of alcohol and those seeking treatment for alcohol use disorder. Fifty-seven (57%) of respondents in the recovery housing resident survey are in recovery from alcohol use disorder.

We thank the Ohio Department of Development and the Ohio Department of Mental Health and Addiction Services for using these funds to advance equity. As noted in Ohio's Recovery Housing Environmental Scan dated 2021, we know that there are many populations who are underserved or unserved by quality recovery housing, including those listed in the action plan such as Ohioans who identify as LGBTQIA, Ohioans of color, and rural Ohioans. By prioritizing these populations Ohio can

35 E. Gay Street, Suite 401 | Columbus, OH 43215 614-453-5133 (office) | 614-228-0740 (fax) www.OhioRecoveryHousing.org



expand access to quality recovery housing for these communities that are currently unserved or underserved.

In addition, parents whose minor children live with them are a largely underserved population. The types of buildings and structures that are needed to effectively serve this population are expensive to build and maintain. The funding made available in the action plan would allow communities to build these types of structures and allow for an increase in access to parents in recovery, leading to benefits for both the parents and their children.

We are also excited to see that there is a plan to not only create new housing, but to increase the quality of existing recovery housing in Ohio – ensuring that these dollars are used to benefit the most Ohioans. Ohio Recovery Housing provides a voluntary certification process for recovery homes in Ohio. We review the organization's policies and procedures, perform a program interview, as well as review the physical dwelling to ensure that the property meets or exceeds the standards as outlined by the National Alliance of Recovery Residences.

As the certification is voluntary there are many recovery homes in Ohio that remain uncertified. When we ask about barriers to certification, homes often mention the costs of certification. This is not only the certification fee, which averages about \$600 per year for the two-year certification, but also the costs of making needed repairs and upgrades to homes. These repairs can range from installing appropriate egress windows, installing doors, improving plumbing or installing appliances and many other repairs that are not considered capital expenses but are often out of reach for recovery housing operators.

The draft action plan would provide much needed resources for recovery homes to apply for resources that would allow the physical property to meet quality standards and earn certification. Therefore, this draft plan will not only increase access by creating new housing that will be targeted to underserved communities, but also increase the quality of existing recovery housing, ensuring more Ohioans have access to a recovery home that is safe, healthy, supportive, and affordable.

We do have one recommendation for the plan. As written, the plan would only allow funding to go to organizations who are getting initially certified. ORH certifies properties, not organizations. So, there are many organizations which have some of their properties certified and others remain uncertified. Mostly, due to the reasons listed previously. These properties remain uncertified due to the costs of needed repairs or upgrades to the homes. We ask that this be clarified so the funding is for *properties* that are earning initial certification. This would allow organizations that have some properties certified but others uncertified to have all their properties certified with Ohio Recovery Housing.

Additionally, certified homes must maintain quality in order to keep their certification. ORH performs a quality review that includes a policy and procedure review, interview and dwelling review of the properties once every two years. Even quality recovery homes can experience a need for a major repair and face financial hardship in addressing the need for the repair. If the home cannot afford the repair, they risk losing their certification. Therefore, we also recommend allowing currently certified

35 E. Gay Street, Suite 401 | Columbus, OH 43215 614-453-5133 (office) | 614-228-0740 (fax) www.OhioRecoveryHousing.org



homes who participate in the recertification process to also apply for funding if there is an identified need for an improvement during the recertification process.

We understand that newer homes often do not have access to the same resources, so newer homes should be provided with preference. However, we ask that if there are any dollars remaining after those seeking initial certification receive funds, that existing certified recovery homes be able to access any remaining dollars to address quality improvements that are needed for them to maintain their certification after participating in their recertification review.

Thank you for your consideration and your dedication to quality recovery housing. We look forward to working with you and OhioMHAS on implementing the draft plan.

I would be happy to answer any questions that you may have for me. I can be reached at danielle@ohiorecoveryhousing.org or 614-453-5133.

Danielle Gray
Executive Director

#### Response #1

Thank you for taking the time to submit a comment on Ohio's Recovery Housing Plan. We are taking ORH's recommendations into consideration regarding funding being used for "properties" instead of organizations and the extension of allowability to include properties seeking a renewal of their quality certification. In terms of covering certification costs with these funds we would need to have a deeper conversation regarding the certification fee.



17 S High Street, Suite 799, Columbus, OH 43215 614-228-0747 | www.TheOhioCouncil.org

(f) (iii) @theohiocouncil

December 2, 2021

Ian Thomas
Ohio Department of Development
Riffe Center, 77 S. High Street
Columbus, OH 43215

#### Delivered via email to: ocd@development.ohio.gov

Dear Mr. Thomas:

Thank you for the opportunity to provide comments on Ohio's Recovery Housing Program Action Plan. My name is Teresa Lampl and I serve as Chief Executive Officer of the Ohio Council of Behavioral Health and Family Services Providers (The Ohio Council), representing more than 160 organizations that offer prevention, addiction treatment, mental health care and family services.

The Ohio Council envisions the establishment and maintenance of a well-financed full continuum of care that includes access to prevention, treatment and recovery supports for all Ohioans.

We know that recovery housing is an essential component of the behavioral health care continuum of care. A recent analysis from a survey performed by Ohio Recovery Housing demonstrates the impact of recovery housing. 91% of residents who move out of recovery housing were moving out to their own home, rejoin their family, move in with a friend or other stable and independent living environment. 98% of residents indicate that they are connected to an ongoing recovery support that is likely to continue after they have left recovery housing. Only 21% of residents were employed when they moved into recovery housing, compared to 52% of residents at move out. A little less than half (48%) of residents had no income when they moved into recovery housing compared to only 33% of move-out respondents. These results indicate that residents of recovery housing not only provide support for recovery, but also help residents gain employment, increase income, and build lasting recovery capital for their future.

We thank the Ohio Department of Development and the Ohio Department of Mental Health and Addiction Services for using these funds to advance equity. Many populations in Ohio are underserved or unserved by quality recovery housing, including those listed in the action plan such as Ohioans who identify as LGBTQIA, Ohioans of color, and rural Ohioans.

In addition, parents whose minor children live with them are a largely underserved population. The types of buildings and structures that are needed to effectively serve this population are expensive to build and maintain. The funding made available in the action plan would allow communities to build these types of structures and allow for an increase in access to parents in recovery. We know that this will lead to long lasting benefits for both parents and their children.



The draft action plan also includes much needed resources for recovery homes to increase quality. The draft plan allows recovery homes in Ohio to assess their quality needs and apply for funding that will help them address those needs.

Accordingly, the Ohio Council is proud to support the draft action plan. It is sound policy that will invest in new housing targeted to underserved communities, while also aiming to strengthen the quality of existing recovery housing – ensuring more Ohioans have access to safe, healthy, supportive, and affordable recovery housing.

Thank you for your consideration and your dedication to quality recovery housing.

Sincerely,

Teresa Lampl

#### Response #2

OCD appreciates the public comment provided.

#### **Appendix**

- Ohio MHAS Agreements and Assurances for Grantees FY 22 https://mha.ohio.gov/static/SupportingProviders/ApplyforFunding/ForCurrentAwardees/2022/FY2 022-Agreements-and-Assurances.pdf
- Ohio MHAS Community Capital Assistance Project Application FY19-24

  <a href="https://mha.ohio.gov/static/Portals/0/assets/SchoolsAndCommunities/CommunityAndHousing/CapitalPlanning/Community-Capital-Plan-FY19-24-Memo-and-Worksheets.pdf?ver=2018-12-14-110627-587">https://mha.ohio.gov/static/Portals/0/assets/SchoolsAndCommunities/CommunityAndHousing/CapitalPlanning/Community-Capital-Plan-FY19-24-Memo-and-Worksheets.pdf?ver=2018-12-14-110627-587</a>
- Ohio MHAS Community Capital Assistance Projects Process Guidelines
  <a href="https://mha.ohio.gov/static/Portals/0/assets/SchoolsAndCommunities/CommunityAndHousing/Community-Planning/2019/CAPITAL.GUIDELINES\_rev\_April2019.pdf?ver=2019-08-09-132425-143">https://mha.ohio.gov/static/Portals/0/assets/SchoolsAndCommunities/CommunityAndHousing/Community-Planning/2019/CAPITAL.GUIDELINES\_rev\_April2019.pdf?ver=2019-08-09-132425-143</a>
- Ohio MHAS Community Plan Guidelines FY 21-22 <a href="https://mha.ohio.gov/wps/wcm/connect/gov/95787a7c-22b5-4714-9ded-defb3a2e5222/Final+Community+Plan+Guidelines+for+2021-2022+.pdf?MOD=AJPERES&CVID=nMihYZ">https://mha.ohio.gov/wps/wcm/connect/gov/95787a7c-22b5-4714-9ded-defb3a2e5222/Final+Community+Plan+Guidelines+for+2021-2022+.pdf?MOD=AJPERES&CVID=nMihYZ</a>.
- Ohio Recovery Housing's Assurances <a href="https://63f78b26-80cc-40a7-b987-4819ba5e1208.filesusr.com/ugd/3c8c7e">https://63f78b26-80cc-40a7-b987-4819ba5e1208.filesusr.com/ugd/3c8c7e</a> 3762097efb4b4eada190dc9985e0e6ba.pdf
- Ohio Recovery Housing's Steps to apply for Certification <a href="https://www.ohiorecoveryhousing.org/applying-for-certification">https://www.ohiorecoveryhousing.org/applying-for-certification</a>